

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JEREMIE M. THOMAS	:	CHAPTER 13
Debtor	:	
	:	
	:	
JEREMIE M. THOMAS	:	
Movant	:	
	:	
vs.	:	
	:	
NATIONSTAR MORTGAGE, LLC	:	
d/b/a MR. COOPER; JACK N.	:	
ZAHAROPOULOS, CHAPTER 13	:	
TRUSTEE	:	
Respondents	:	CASE NO. 1-20-bk-03254-HWV

TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO APPROVE SALE
OF REAL PROPERTY FREE AND CLEAR OF LIENS, CLAIMS AND
ENCUMBRANCES AND APPROVING DISTRIBUTION OF PROCEEDS

AND NOW, this 22nd day of June, 2021, comes Jack N. Zaharopoulos,
Standing Chapter 13 Trustee for the Middle District of Pennsylvania, through his attorney, James
K. Jones, and responds to debtor's Motion for Approval of Sale of Real Property as follows:

- 1) Respondent Jack N. Zaharopoulos is the duly appointed Trustee for this case.
- 2) Trustee does not object to the sale of debtor's real estate as set forth in the
motion.
- 3) Trustee objects to a flat fee of \$3,500.00 for attorney fees as set forth in
Paragraph 6(c) of the motion as a lodestar fee calculated after the closing of the sale would be a
more appropriate method to determine the reasonable compensation and expenses due.
- 4) Debtor's counsel should be directed to escrow \$3,500.00 from the sale
proceeds and be compensated for reasonable services and expenses as determined after a review
of a fee application. Any remaining funds should be paid to the Trustee towards unsecured
claims through the plan.

5. Trustee objects to the distribution of sale proceeds set forth in Paragraph 7 of movant's motion since all non-exempt proceeds for the sale should be paid into the plan for the benefit of unsecured creditors.

WHEREFORE, your Trustee respectfully requests Your Honorable court to approve the sale as requested in debtor's motion. Debtor's counsel should be directed to escrow the requested fees and to thereafter submit a fee application to justify reasonable compensation and expenses. Any remaining proceeds after counsel is compensated are to be paid to Trustee for distribution to allowed unsecured claims filed in this case.

Respectfully submitted,

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717)566-6097

BY: /s/James K. Jones
Attorney for Trustee
jkjones@pamd13trustee.com

CERTIFICATE OF SERVICE

AND NOW, this 22nd day of June, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

John Hyams, Esquire
2023 N. 2nd Street, Suite 203
Harrisburg, PA 17102

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee